

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Steven Mendoza,)	
)	
<i>Plaintiff,</i>)	
)	
-vs-)	No. 20-cv-670
)	
Thomas Dart, Sheriff of Cook)	Judge Bucklo
County, et al.,)	
)	
)	
<i>Defendants.</i>)	

**PLAINTIFF'S SECOND SET OF INTERROGATORIES TO
DEFENDANT COOK COUNTY**

Plaintiff, by counsel, and pursuant to Rule 33 of the Federal Rules of Civil Procedure, requests defendant Cook County to respond to the following interrogatories:

1. On August 13, 2021, Sergeant Gwendolyn Johnson testified as the Sheriff's Rule 30(b)(6) designee. During a break, Sergeant Johnson said she entered the male and female public bathrooms and observed each bathroom had one toilet that had three grab bars around the toilet. *See* Johnson Dep 83-84. Identify, by month and year, when these grab bars observed by Sgt. Johnson on August 13, 2021 were installed in the male and female public bathroom.

2. On August 13, 2021, Sgt. Johnson testified the male and female public bathroom each had a toilet with three grab bars. Identify, with reasonable particularity, the documents in possession of defendant that identify when these grab bars were installed.

3. Plaintiff produced a document pursuant to the Mandatory Initial Discovery Program marked CCSAO Bennett 002284, identifying Circuit Court Branch 35/38 is “Owned” and under “Year Built” it states “1/1/1980.” A portion of this document is below:

	Facilities under 35,000 square ft							
HH.054.001	Ruth M. Rothstein Core Center	2020 West Harrison St.	Chicago	60612	Clinic	CCHHS	Owned	1/1/1998
CE.007.001	CCHD Maintenance Fac. Dist. 5 - Bldg A	13600 S. Ashland Ave.	Riverdale	60827	Garage	CCHD	Owned	1/1/2002
CE.005.001	CCHD Maintenance Fac. Dist. 3 - Bldg A	901 W. 26th St.	LaGrange	60526	Garage	CCHD	Owned	1/1/1950
CE.003.002	CCHD Maintenance Fac. Dist. 1 - Bldg B	2325 N. Meacham Rd.	Schaumburg	60173	Garage	CCHD	Owned	1/1/1986
CE.004.001	CCHD Maintenance Fac. Dist. 2 - Bldg A	9801 Bailard Rd.	Des Plaines	60016	Garage	CCHD	Owned	1/1/2000
PS.023.001	Circuit Court Branch 35/38	727 E. 111th St.	Chicago	60628	Courts	Circuit Court	Owned	1/1/1980
CF.006.005	CCHD Maintenance Fac. Dist. 4 - Bldg E	8800 W. 135th St.	Orland Park	60462	Garage	CCHD	Owned	1/1/2007

Identify, by month and year, when Cook County first took ownership of Circuit Court Branch 35/38.

4. When Circuit Court Branch 35/38 was built in in 1980, did one stall in the public bathroom for men have at least one grab bar around the toilet?

5. Identify, by year and month, when the male public bathroom at Circuit Court Branch 35/38 had at least one grab bar installed around a toilet.

6. Identify the document, by date and/or title, that identifies the year when the male public bathroom at Circuit Court Branch 35/38 had at least one grab bar installed around the toilet.

7. Identify, by month and year, when the male public toilet at Circuit Court Branch 35/38 initially had three grab bars around the toilet.

8. Identify the document, by date and/or title, that identifies the year when the male public bathroom at Circuit Court Branch 35/38 initially had three grab bars installed around the toilet.

9. The 2010 ADA Standards for Accessible Design provides a way to measure clearances around water closets and in toilet compartments. This information is shown below:

Figure 604.2
Water Closet Location

604.3 Clearance. Clearances around water closets and in toilet compartments shall comply with 604.3.

604.3.1 Size. Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall.

Department of Justice

2010 Standards: Titles II and III – 161

TECHNICAL

CHAPTER 6: PLUMBING ELEMENTS AND FACILITIES

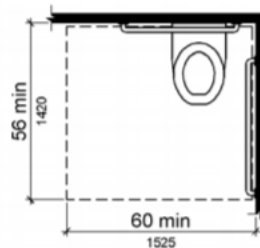


Figure 604.3.1
Size of Clearance at Water Closets

Provide the size of clearance at the water closet for the public bathroom for men at Circuit Court Branch 35/38.

10. Plaintiff produced a document from Cook County's FOIA Officer that is titled "Circuit court Branch Courthouse 35/38 – April 20, 2017 Observation Notes 727 E. 111th Street, Chicago, IL Report Date: May 5th, 2017." A portion of this document is shown below:

Circuit court Branch Courthouse 35/38 - April 20, 2017 Observation Notes

727 E 111th Street Chicago IL

Report Date: May 5th, 2017

The STV Heery team has performed a walkthrough and prepared an observation report for Circuit Court Branch Courthouse 35/38 located at 727 E. 111th Street Chicago IL. The team toured the property to review the life safety systems, security systems and ADA compliance. Based on the observations from the walkthrough the team developed a list of potential items that should be addressed to bring the leased areas to current life safety, security and ADA standards at the courthouse building. The items have been summarized into the following main categories; General Building Area, the Sally Port area, Holding Cells and Interview Rooms. Each area has a list of possible items to address and a rough order of magnitude budget for these items, including soft cost.

Area #1: General Building \$ [REDACTED]

Identify, by name and title, each person who attended the walkthrough with STV Heery Team.



an attorney for plaintiff

Patrick W. Morrissey
Thomas G. Morrissey, Ltd.
10150 S. Western, Rear
Chicago, IL 60643
(773)233-7901

CERTIFICATE OF SERVICE

I, Patrick W. Morrissey, state that on August 26, 2021 I served the foregoing by email to the attorney listed below:

Monica Burkoth
Lisa M. McElroy
Samuel Branum
Johnson & Bell, LTD.
33 W. Monroe St, Suite 2700
Chicago, IL 60603
Attorney for Defendant Dart

Miguel Larios
Assistant State's Attorney
Richard J. Daley Center
Chicago, IL 60602
Attorney for Cook County



Thomas G. Morrissey, Ltd.
10150 S. Western, Suite Rear
Chicago, IL 60643
(773) 233-7901

An attorney for plaintiff